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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10 REEVES NELSON, an individual,

11 Plaintiff,

12 v.

13 TIME, INC., a Delaware corporation;
14 GEORGE DOHRMANN, an individual; and
DOES 1 to 50, inclusive,

15 Defendants.
16
17
18

CASE NO.

PLAINTIFF'S COMPLAINT FOR:

1. **DEFAMATION;**
2. **FALSE LIGHT;**
3. **INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS;**

[JURY TRIAL DEMANDED]

19 COMES NOW PLAINTIFF REEVES NELSON ("Nelson" and/or "Plaintiff") and hereby alleges
20 as follows:

21 **VENUE AND PARTIES**

22 1. PLAINTIFF REEVES NELSON is and all times relevant hereto was an individual
23 residing in and/or doing substantial business in the County of Los Angeles, State of California.

24 2. DEFENDANT TIME, INC. ("Time" and/or "Defendant") is and at all times relevant
25 hereto was a Delaware corporation doing substantial business in the County of Los Angeles, State of
26 California. Plaintiff is informed and believes that Time is and at all times relevant hereto was the
27 owner and publisher of the international sports magazine weekly SPORTS ILLUSTRATED ("Sports
28 Illustrated").

3. DEFENDANT GEORGE DOHRMANN (“Dohrmann” and/or “Defendant”) is and at all times relevant hereto was an individual doing substantial business in the County of Los Angeles, State of California.

4. Plaintiff is unaware of the true names and capacities, whether individual, corporate, associate or otherwise, of Defendant DOES 1 to 50, inclusive, and therefore sues said Defendants by such fictitious names. Plaintiff will seek leave of Court to amend this complaint to show the true names and capacities of such defendants when the same have been ascertained. Plaintiff is informed, believes and thereupon alleges that each of the fictitiously named defendants is responsible to Plaintiff for the wrongful acts, injuries and damages suffered and alleged herein, or are subject to the jurisdiction of the Court as a necessary party for the relief herein requested.

5. Plaintiff is informed, believes and thereupon alleges that each of the aforementioned Defendants (“Defendants”), are now and were at all times mentioned herein the agent, principal, partner, joint venturer, employee, subsidiary entity, parent entity, and/or alter-ego of the remaining Defendants, and that all of the acts and conduct alleged herein were performed within the course and scope and in the furtherance of such agency, partnership, joint venture, employment, subsidiary, parent, and/or alter-ego relationship.

6. Plaintiff is informed, believes and thereupon alleges that each of the Defendants knew or should have known that the wrongs herein mentioned were about to be committed or were being committed, and further had the power to prevent or aid in preventing the commission of the same, or to prevent future injury therefrom. Defendants refused and/or failed to prevent or aid in preventing the commission of said wrongs or injuries, and said wrongs were in fact committed and injuries occurred.

7. Venue is properly had in this Court in that all or substantially all of the events and occurrences that are the basis of all causes of action set forth below occurred in the County of Los Angeles, State of California.

GENERAL ALLEGATIONS

8. Plaintiff Reeves Nelson is a former student and college basketball player for U.C.L.A. He is presently twenty years old. Prior to playing for U.C.L.A., Plaintiff Nelson was a star athlete in high school, earning numerous accolades for his performance on both the basketball and football teams.

1 Among other things, Nelson was named to the first-team All-Trans Valley League three times and twice
2 earned All-State awards during his latter two years of high school. ESPN, Rivals.com, and Scout.com
3 repeatedly rated him among the top high school basketball players in the country, and Plaintiff was even
4 named to the youth divisions of the U.S.A. Olympic team in 2007 and 2008. Nelson played for the
5 U.C.L.A. basketball team from 2009 through 2011, rapidly earning a reputation for himself as one of
6 the team's (and college basketball's) rising stars. During his freshman year, Nelson was named to the
7 Pacific-10 Conference's All Freshman Team. He also earned U.C.L.A.'s Seymour Armond Memorial
8 Award/Most Valuable Freshman along with teammate and future N.B.A. player Tyler Honeycutt.
9 During his sophomore year, Nelson was twice named the Pacific-10 Conference Player of the Week and
10 repeatedly led his team in scoring, rebounding, and field goal percentage. Following the 2010-2011
11 season, Nelson was named to the All Pacific-12 Conference Men's First Basketball Team, the U.S.
12 Basketball Writers' Association District IX Team, and the National Association of Basketball Coaches
13 All-District 20 Second Team. He also received U.C.L.A.'s Gerald A. Finerman Award as Team
14 Rebounding Leader and the Coach John Wooden Award/Tri-Most Valuable Player, which latter honor
15 he shared with teammates Tyler Honeycutt and Malcolm Lee.

16 9. Because of his outstanding performance during his first two seasons at U.C.L.A., the Los
17 Angeles Times referenced Nelson in December 2011 as "a major reason why UCLA (2-5) was the
18 preseason pick to win the Pac-12 Conference." Unfortunately for Nelson, however, his college
19 basketball career at U.C.L.A. was abruptly cut short when he was suspended and shortly thereafter
20 dismissed from U.C.L.A.'s team in early December 2011.

21 10. In November 2011, Nelson was suspended briefly after showing up late to a team
22 meeting and then missing a team flight to Hawaii for a team game. On or around December 3, 2011,
23 during a team game against the University of Texas at Austin, Nelson missed a defensive assignment
24 and subsequently laughed and pointed at fans chanting his name late in the game, which U.C.L.A.
25 ultimately lost. For his "insubordinate" conduct, Nelson was dismissed from the team by Coach
26 Howland. His mother Sheila Nelson was subsequently quoted by the Los Angeles Times on or around
27 December 9, 2011, regarding her son's behavior and his dismissal from the team. Notwithstanding his
28 suspension and dismissal from the team, Plaintiff Nelson still enjoyed a good reputation as an honest,

1 hard-working, and well-liked team-player. He looked forward to his planned career as a professional
2 basketball player.

3 11. Nelson pursued his goal of playing professional basketball in the N.B.A. by immediately
4 playing with the Lithuanian Basketball League starting in December 2011. To prepare and train full-
5 time for the N.B.A., Plaintiff left the league after approximately two months.

6 12. On or around February 28, 2012, Defendant Time published the online version of its
7 weekly issue of Sports Illustrated magazine, which featured a lengthy article by Defendant Dohrmann
8 entitled "Special Report: Not the U.C.L.A. Way," a true and correct copy of which is attached hereto as
9 **Exhibit A** (the "article"). The article subsequently appeared in Defendant's March 5, 2012 print issue
10 of Sports Illustrated magazine and remains freely available for viewing worldwide. Defendants claimed
11 that the article's content was based on interviews with "more than a dozen players and staff members
12 from the past four Bruins teams." Id. In this article, Defendants criticized U.C.L.A.'s men's basketball
13 team, its players, and Coach Howland at length, characterizing it as a program "veering off the rails."
14 Id.

15 13. In this article, Defendants specifically blamed U.C.L.A.'s troubles on Plaintiff Nelson,
16 describing him as "a classic bully, targeting teammates who weren't as athletically gifted as he and
17 tormenting the support staff." **Exhibit A.** According to the article, Plaintiff Nelson was the "one player
18 [who] intentionally injured teammates but received no punishment," someone who "often reacted to
19 hard fouls or calls against him in practice by committing violent acts against teammates" and someone
20 who "stalk[ed] his targets, even running across the court, away from a play, to hit someone." Id.
21 Nelson was "the ringleader among the freshmen," and "teammates came away with a different
22 impression of him after only a few practices. Nelson could be a nice guy, but he had what one player
23 calls 'this crazy side.'" Id. Plaintiff Nelson's psychotic behavior "undermin[ed] team discipline and
24 morale" and "quickly sabotag[ed] a storied program led by one of the nation's most respected coaches."
25 Id. Defendants even ran a photograph of Nelson standing next to Coach Howland with a caption
26 reading "Reeves Nelson (right) bullied and sometimes injured his teammates before coach Ben
27 Howland dismissed him from the team in November." Id. Defendants' article created a firestorm of
28 negative press, publicity, and commentary for U.C.L.A. and Plaintiff Nelson in particular.

1 14. As support for their general description of Plaintiff Nelson, Defendants recounted the
2 following specific instances of Nelson's supposed violent and temperamental behavior in their article:

- 3 a. In 2009, Nelson reportedly fought during practice with teammate Mike Moser -
4 "In the fall of 2009, during a routine practice drill, UCLA freshman Mike Moser
5 ran through a team of defenders and was suddenly hit in the chest by a forearm
6 and shoulder that nearly knocked him to the ground. It was the second time
7 Moser had been the victim of an illegal screen from fellow freshman Reeves
8 Nelson, and he'd had enough. Moser told Nelson that if he did it again he would
9 punch him in the face. The drill was reset, and in the words of one player who
10 was present, 'Mike comes across and Reeves just hits him again. Mike wasn't a
11 guy who would back down. He squared up and they went at.'" **Exhibit A.**
- 12 b. Nelson reportedly fought with teammate Drew Gordon at a teammate's
13 apartment, giving Gordon a black eye - "Is it when the scuffle occurs away from
14 practice, like the one between Nelson and Gordon at a teammate's apartment?
15 Gordon ended up with a black eye." Id.
- 16 c. Nelson intentionally re-injured teammate James Keefe by pulling down on his
17 surgically-repaired left shoulder during practice - "Once, Nelson got tangled up
18 with forward James Keefe while going for a rebound. Keefe was playing with a
19 surgically repaired left shoulder, and Nelson pulled down suddenly on Keefe's
20 left arm. That reinjured Keefe's shoulder, and he missed several weeks." Id.
- 21 d. Nelson intentionally attacked teammate Alex Schrempf during practice by
22 "hacking" him from behind - "Later in the season Nelson hacked walk-on Alex
23 Schrempf, the son of former NBA player Detlef Schrempf, from behind on a
24 breakaway, knocking Schrempf to the ground. The back injury Schrempf
25 suffered sidelined him for months." Id.
- 26 e. Nelson intentionally attacked teammate Brendan Lane during practice by
27 throwing an elbow at him - "In another workout Nelson threw an elbow at Lane
28 after the whistle, injuring Lane's ribs." Id.

- 1 f. Nelson intentionally stomped on teammate Tyler Trapani's chest as he lay on the
2 ground during practice - "Walk-on Tyler Trapani was another Nelson victim.
3 After Trapani took a charge that negated a Nelson dunk, Nelson went out of his
4 way to step on Trapani's chest as he lay on the ground. Trapani is John Wooden's
5 great-grandson." Id.
- 6 g. When Coach Howland reportedly canceled a New Year's Eve party for the team
7 after hearing about it from players, Nelson decided his roommate Tyler
8 Honeycutt was the "rat" and urinated on his bed and clothes to get his "revenge"
9 - "When informing the players of the bed check, Howland remarked, 'So there
10 will be no party bus,' which led some underclassmen to conclude that they had
11 an informant in their midst. Nelson thought that Honeycutt, one of his
12 roommates, was the rat, and he got his revenge. A short time later, Nelson
13 returned home from a night of partying, piled Honeycutt's clothes on Honeycutt's
14 bed, and then urinated on the clothes and flipped the bed over." Id.
- 15 h. Because of the aforementioned incident, Honeycutt reportedly requested and
16 received his own dorm room away from Nelson - "It didn't appear that Nelson
17 was punished for the incident, but players say that Honeycutt was given his own
18 single dorm room." Id.
- 19 i. Nelson repeatedly attacked and berated teammate Matt Carlino, single-handedly
20 causing him to leave U.C.L.A. and transfer to B.Y.U. - "From the first practice,
21 Nelson's treatment of Carlino was a divisive issue. Carlino suffered a concussion
22 during the preseason that caused him to miss the first three games. Nelson
23 ridiculed Carlino for letting the injury sideline him. He told Carlino he didn't
24 belong at UCLA and wasn't any good. He would yell at Carlino to leave the
25 locker room, calling him 'concussion boy.' When Carlino returned to workouts,
26 Nelson would go out of his way to set a screen on Carlino so he could hit him.
27 Eventually, players say, Carlino dreaded practice. It was of little surprise when
28 he left UCLA midway through the season and transferred to BYU.... 'But

1 everyone knew why Matt left,' says one player. 'He didn't want to keep sitting
2 on the bench, but most of all he didn't want to be around Reeves anymore. That
3 wasn't quitting. That was just smart.'" Id.

4 j. Notwithstanding the above-mentioned incidents, Coach Howland reportedly
5 refused to discipline Nelson because Nelson was a star player for the team, even
6 when Nelson berated Howland - "After each of the incidents, Howland looked
7 the other way. One team member says he asked Howland after a practice why he
8 wasn't punishing Nelson, to which he said Howland responded, 'He's producing.'
9 ... Early in 2011, after the conference season began, players noticed a subtle shift
10 in how Howland handled the mercurial Nelson. '[Howland] always gave Reeves
11 the benefit of the doubt on foul calls in practice so Reeves wouldn't lose it and be
12 even more disruptive,' says one team member. 'But when Reeves started going
13 up against the Wear twins, Coach would call it straight. That got to Reeves. He
14 started yelling more at Coach, showing him up.'"

15 15. The article's aforementioned characterization of Nelson and its recounting of specific
16 instances of Nelson's misbehavior are false. Nelson did not fight with Moser, nor did he fight with
17 Gordon, nor did he bully, stalk, target, and attack his other teammates or team staff as described above,
18 nor did Coach Howland hold back from disciplining him for any sort of misconduct. During his college
19 basketball career, Nelson did not intentionally harm or intentionally try to physically harm any member
20 of the U.C.L.A. basketball team or staff, nor did he "stalk" or "target" any of his teammates or team
21 staff during practice sessions. Nelson did not "lose it" during practice or otherwise "disrupt" practice,
22 not because of foul calls or otherwise, nor did he bully or torment his teammates or team staff,
23 including but not limited to the team's coach Ben Howland.

24 16. Attached and incorporated herein as **Exhibit B** are eighteen (18) sworn declarations
25 from the overwhelming majority of Nelson's former teammates, including but not limited to Nelson's
26 reported "victims" referenced above, as follows:

- 27 a. Matt DeMarcus;
28 b. Larry Drew, Jr.;

- c. Drew Gordon;
- d. Tyler Honeycutt;
- e. Kenny Jones;
- f. Tyler Lamb;
- g. Lazerio Jones;
- h. Malcolm Lee;
- i. J'mison Morgan;
- j. Alex Schrempf;
- k. Josh Smith;
- l. Anthony Stover;
- m. Travis Wear;
- n. Tyler Trapani;
- o. Norman Powell;
- p. David Wear;
- q. Blake Arnet;
- and
- r. Jerime Anderson.

17. Every single one of these declarations confirm that the article's general description of Nelson as a psychotic bully is false and that the specific instances of Nelson's supposed "bullying" described in the article never happened and/or were grossly distorted out of all proportion. Every single one of these declarations confirms that Nelson did not intentionally attack or try to physically harm his fellow teammates or team staff, nor was he favored by Coach Howland, nor did he "stalk" or "target" his "victims," nor was he the "classic bully" described in the article.

18. Supposed Nelson "victim" Tyler Honeycutt has confirmed that Plaintiff never urinated on his bed and clothes as described by Defendants in their article, nor did he request to be moved to another dorm room because of Nelson. Contrary to the outrageous story told in the article, Nelson played a minor college prank on his roommate Honeycutt, throwing candy and baby powder onto his bed when Honeycutt left their dorm room. Defendants never contacted and never even *tried* to contact

1 Honeycutt about this incident. Had they contacted Honeycutt, he would have categorically denied
2 Defendants' absurd claim that Plaintiff urinated on Honeycutt's bed and clothes as "revenge" for being
3 a "rat."

4 19. Supposed Nelson "victim" Tyler Trapani has confirmed that Plaintiff Nelson did not go
5 "out of his way" to step on Trapani's chest as Trapani lay on the ground during a practice drill. On the
6 contrary, Trapani merely took a charge from Nelson during a practice drill, as happens quite often in
7 basketball. Defendants did not contact or even try to contact Trapani to find out what actually
8 happened. Had they bothered to contact Plaintiff's supposed "victim," Trapani would have explained
9 to Defendants that Nelson never intentionally harmed him or tried to harm him as Defendants
10 subsequently claimed.

11 20. Supposed Nelson "victim" Drew Gordon has confirmed that he never fought with
12 Plaintiff Nelson, not at a teammate's apartment or anywhere else, nor did Nelson ever give him a black
13 eye as described in the article. Defendants did not contact or even try to contact Gordon about this
14 incident. Had they bothered to contact him, Gordon would have explained to Defendants that he and
15 Nelson have been close friends since junior high school and have never fought in this manner.

16 21. Supposed Nelson "victim" Alex Schrempf has confirmed that Plaintiff Nelson did not
17 intentionally "hack" at him from behind during practice. Schrempf actually explained this to
18 Dohrmann before the article's publication. He further explained to Dohrmann that he was and remains
19 "close friends" with Plaintiff Nelson, hardly the kind of attitude one would expect a teammate to
20 exhibit towards his supposed tormentor as described in Defendants' article. Schrempf further denied to
21 Dohrmann numerous other parts of Dohrmann's article describing Plaintiff's bullying behavior,
22 including Nelson's purported behavior toward James Keefe, Tyler Trapani, and Matt Carlino.
23 Defendants intentionally kept out every single one of Schrempf's denials from their article.

24 22. Players David Wear, Travis Wear, Jerime Anderson, Matt DeMarcus, Drew Gordon,
25 Lazeric Jones, Tyler Lamb, Alex Schrempf, and Anthony Stover each have specifically confirmed that
26 Defendants' description of Plaintiff Nelson's alleged bullying of teammate Matt Carlino was false.
27 Plaintiff did not torment Carlino as described by Defendants. Contrary to the claims made in
28 Defendants' article, most of his former teammates believe that Carlino transferred to B.Y.U. from

1 U.C.L.A. because he wanted more playing time during games.

2 23. Players Jerime Anderson, Matt DeMarcus, Drew Gordon, Alex Schrempf, J'mison
3 Morgan, and Anthony Stover each have specifically confirmed that Defendants' description of
4 Plaintiff's alleged attack on teammate James Keefe is false. Each of these players attended the practice
5 at which Keefe's shoulder was re-injured, and each has separately confirmed that this injury did not
6 result from Plaintiff Nelson's decision to intentionally injure or cause harm to Keefe.

7 24. Every one of these eighteen players has separately confirmed that Defendants'
8 descriptions of Nelson's interactions with Coach Howland are false. They confirm that Nelson never
9 "lost it" during practice, nor did Nelson otherwise "disrupt" practice, not because of foul calls or
10 otherwise. These players confirm that Coach Howland did not give Nelson "the benefit of the doubt on
11 foul calls in practice so [Nelson] wouldn't lose it," and that Plaintiff did not yell at Coach Howland if a
12 foul was called against him during practice. These players further confirm that Coach Howland did not
13 favor Nelson over the other players in any fashion, not by withholding discipline because he was
14 "producing" or otherwise.

15 25. These player declarations further establish that the players whom Defendants did contact
16 denied, disproved, and/or disclaimed any knowledge of the Plaintiff's purported bullying behavior as
17 described in Defendants' article to Defendants before the article was published. Defendants purposely
18 chose to exclude these denials and/or repudiations of knowledge from the article because they
19 completely undercut both Defendants' general characterization of Nelson as the scourge of the team and
20 Defendants' descriptions of specific instances of Plaintiff's supposed behavior.

21 26. Despite writing a feature piece attacking the U.C.L.A. basketball program at length,
22 Defendants did not bother to contact the overwhelming majority of the team players. Of the eighteen
23 players listed above, Defendants did not contact or try to contact any of them other than two - Alex
24 Schrempf and Blake Arnet - both of whom told Dohrmann that Defendants' version of events
25 (ultimately published in the article) was incorrect and both of whom were *not* quoted in the article.
26 None of these players contributed any of the quotes attributed to anonymous "players" in the article, and
27 all of these players have since confirmed that the bulk of Defendants' claims about Plaintiff Nelson are
28 false.

1 27. Further underscoring the malicious nature of Defendants' article, Defendants twisted
2 around quotes from Plaintiff Nelson to Defendant Dohrmann as well as four-month-old quotes given by
3 Plaintiff's mother Sheila to the Los Angeles Times to make it appear as if both confirmed the article's
4 contentions about Plaintiff:

- 5 a. According to the article, Nelson confirmed each of his reported acts of violence
6 and bullying against his teammates - "Nelson confirmed all these incidents to SI
7 and expressed his regret, saying, 'On all that stuff, I have no trouble admitting
8 that I lost control of my emotions sometimes. I take responsibility for my
9 actions. I'm really just trying to learn from the mistakes I made on all levels.'"

10 **Exhibit A.**

- 11 b. According to the article, Nelson also specifically confirmed urinating on
12 teammate Tyler Honeycutt's mattress and clothing - "When asked by SI about the
13 incident, Nelson said, 'I would dispute that that is exactly what happened, but I
14 understand people would say that is what happened. But I think, most of all, you
15 should know that Tyler and I are still friends.'" Id.
- 16 c. In the article, Defendants implied that Nelson's mother confirmed her son's
17 reported acts of violence and bullying against his teammates by repeating her
18 four-month-old comments to the Los Angeles Times immediately after
19 describing Nelson's supposed acts of violence and Coach Howland's refusal to
20 discipline Nelson for the same - "Nelson's mother, Sheila, told the Los Angeles
21 Times that she wished Howland had been stricter with her son earlier in his
22 career." Id.
- 23 d. Defendants even implied that Plaintiff Nelson himself confirmed that his
24 mother's quotes to the Los Angeles Times were about his reported violence and
25 bullying of his teammates and team staff - "'I think what my mom was saying
26 was that when I went to college I was just 17,' Nelson, who is back in Modesto
27 training for the NBA draft, told SI. 'I'm not trying to make excuses for what I
28 did, but I got into some weird behavior patterns, and I think my mom was saying

1 that if instead of one big punishment at the end, what if there had been smaller
2 punishments along the way.’” Id.

3 28. Plaintiff Nelson did not confirm any of the aforementioned incidents to Defendants, nor
4 did he confirm that his mother Sheila’s four-month-old comments to the Los Angeles Times were about
5 his reported bullying and violence committed against his teammates and team staff, nor were his mother
6 Sheila’s comments to the Los Angeles Times made in reference to any of Plaintiff’s reported acts of
7 violence and bullying against his teammates and team staff.

8 29. Plaintiff Nelson did briefly speak with Defendant Dohrmann about his U.C.L.A.
9 basketball career prior to the publication of the article. During this conversation, however, Defendant
10 Dohrmann never questioned Nelson about any of the aforementioned incidents of supposed bullying
11 and violence against teammates and team staff. Although Nelson made the statements quoted above, he
12 made these statements in reference to his arriving late to a team meeting in November 2011, his missing
13 a team flight to Hawaii, and his subsequent goofing off during the December 2011 U.C.L.A. - U. Texas
14 game, all of which behavior ultimately led to his suspension and dismissal from U.C.L.A.’s basketball
15 team.

16 30. Defendants published the article either with knowledge that it was false and defamatory
17 of the Plaintiff and/or, if the false and defamatory nature of it was not known to Defendants, with
18 reckless disregard for its obvious falsity and defamatory nature. Plaintiff is informed and believes that
19 Defendants recklessly and negligently failed to investigate the claims in the article and failed to adhere
20 to professional standards of reporting. Plaintiff is informed and believes that Defendants failed to
21 contact numerous obvious witnesses who could have confirmed or disproved the allegations in the
22 article. Plaintiff is informed and believes that Defendants published the false characterizations and
23 recounting of events about Plaintiff when there were obvious reasons to doubt the veracity of their
24 informants and/or accuracy of their informants’ reports, i.e. Plaintiff’s alleged “victims” themselves
25 would have informed Defendants that Defendants’ version of the events recounted and Plaintiff’s
26 behavior were inaccurate. Had Defendants contacted Plaintiff’s reported “victims” and/or the other
27 players on the team, they would have learned that Plaintiff did not bully, stalk, and attack his teammates
28 and team staff as described in the article. Had Defendants questioned Plaintiff directly about the

1 aforementioned incidents, Plaintiff himself could and would have confirmed that these incidents did not
2 occur and/or did not transpire as described in the article.

3 31. Defendants, moreover, purposely and deliberately altered the material meaning of
4 Plaintiff Nelson's and his mother's comments to the press to make it appear as if both had confirmed
5 the article's descriptions of Nelson's behavior while on the U.C.L.A. basketball team. Plaintiff is
6 informed and believes that readers of the article have found Defendants' portrait of Plaintiff Nelson
7 especially damning because much of it appeared to be a self-portrait, told by Plaintiff Nelson in his own
8 words.

9 32. Defendant Dohrmann has exhibited a years-long pattern and practice of attacking
10 U.C.L.A.'s men's basketball team. Plaintiff is informed and believes that this marked hostility and ill
11 will has motivated Dohrmann's decision to pen the article and describe Plaintiff in this fashion. Several
12 years ago, Dohrmann publicly attacked U.C.L.A.'s Baron Davis and then-coach Jim Harrick for Davis's
13 driving a black 1991 Chevy Blazer, which car Dohrmann publicly claimed had been purchased in
14 violation of N.C.A.A. rules. Plaintiff is informed and believes that Dohrmann grew even more upset
15 when the N.C.A.A. and Pac-10 Conference issued findings supporting the school and undercutting
16 Dohrmann's false and malicious attacks. Plaintiff is informed and believes that Dohrmann was willing
17 to quote any source, however unreliable, as support for his continued attacks on U.C.L.A., as he did in
18 2010, when he publicly attacked Coach Howland and U.C.L.A. in his 2010 book "Play Their Hearts
19 Out: A Coach, His Star Recruit, and the Youth Basketball Machine." As the source for these false and
20 malicious attacks, Dohrmann relied on a less than reputable source - a coach who sexually assaulted
21 brain-injured hospital patients - for his disparaging information. Dohrmann has even admitted to his
22 hostile and malicious mentality in a 2011 article in the Columbia Journalism Review, which mind-set
23 he personally described as, "[y]ou walk in and you assume that the school is cheating."

24 33. Plaintiff is informed and believes that Defendants published the article to "take down" a
25 major national collegiate basketball program so as to sell greater numbers of Sports Illustrated issues
26 and increase advertising and sales revenue for Defendants, as well as generate positive publicity for
27 Defendant Dohrmann. Plaintiff is informed and believes that Defendants decided the most effective
28 way to attack U.C.L.A.'s basketball program would be to portray Plaintiff Nelson as a "superstar athlete

1 gone wild,” a violent and temperamental individual who was permitted to stay and play on the team
2 despite his continued anti-social and anti-team behavior. Plaintiff is further informed and believes that
3 Defendant Dohrmann in particular chose to attack Plaintiff and U.C.L.A.’s basketball program because
4 of personal animosity, hostility, and ill will towards the university. Defendants published these false
5 and malicious claims against Plaintiff knowing full well that U.C.L.A. as an institution would be
6 precluded by law from publicly defending Plaintiff Nelson. Defendants further published this article
7 knowing full well that Nelson himself was a vulnerable twenty-year-old student unable to publicly
8 defend himself in the court of public opinion against the largest magazine publisher in the United States
9 and its Pulitzer-Prize-winning “journalist.”

10 34. By publishing this false and defamatory attack on Nelson, Defendants have caused
11 irreparable harm to Plaintiff’s personal, professional, and public reputation, his good name, and his
12 budding professional basketball career.

13 35. On or around February 29, 2012 and again on March 2, 2012, Plaintiff Nelson demanded
14 that Defendants issue an immediate retraction of the aforementioned article without success. True and
15 correct copies of these demands are attached hereto and incorporated herein as **Exhibit C**. Defendants
16 refused to issue any retraction or otherwise publicly acknowledge the falsehoods, lies, and inaccuracies
17 that they have published about Plaintiff Nelson. Defendants refused to identify any of their anonymous
18 “sources” for this article, presumably because they have none to identify.

19 **FIRST CAUSE OF ACTION**

20 **DEFAMATION**

21 **(AGAINST DEFENDANTS AND DOES 1-50)**

22 36. Plaintiff realleges and incorporates herein by reference, as though set forth in full, each
23 and every allegation contained in Paragraphs 1 through 35, inclusive.

24 37. On or around March 5, 2012, Defendants published an article entitled “Special Report:
25 Not the U.C.L.A. Way” in Sports Illustrated magazine, attached hereto as **Exhibit A**. This article
26 contained numerous falsehoods, exaggerations, and inaccuracies about Plaintiff Nelson as described
27 above.

28 38. The article’s aforementioned characterizations of Plaintiff Nelson and recounting of

specific events about him are defamatory and libelous on their face because they charge Plaintiff with committing the crimes of assault and battery, clearly expose Plaintiff to hatred, contempt, ridicule, and obloquy, charge Plaintiff with improper and immoral conduct, and have caused Plaintiff to be shunned and avoided by prospective basketball teams and employers.

39. The article's aforementioned characterizations of Plaintiff Nelson and recounting of specific events about him have a tendency to injure Plaintiff in his occupation as a professional basketball player or any other future occupation he might choose. The article characterizes Nelson as a temperamental, psychotic, and violent individual with a tendency to bully, stalk, and physically attack his own friends and colleagues at the slightest provocation, thus lowering Plaintiff in the estimation of the community and deterring third persons from associating or dealing with him.

40. As a proximate result of the above-described publication, Plaintiff has suffered and will continue to suffer loss of his personal and professional reputation, shame, mortification, and emotional distress all to his general damage, but which Plaintiff is informed and believes will exceed \$10,000,000, plus interest accrued and growing.

41. As a proximate result of the above-described publication, Plaintiff has further suffered and will continue to suffer a loss to his chosen profession and occupation as a professional basketball player.

42. Each of Defendants' acts as described above was willful, oppressive, fraudulent, and malicious, within the meaning of California Civil Code § 3294, thereby entitling Plaintiff to recover exemplary and punitive damages against each Defendant in amounts according to proof at trial, which Plaintiff is informed and believe will collectively exceed \$10,000,000.

SECOND CAUSE OF ACTION

FALSE LIGHT

(AGAINST DEFENDANTS AND DOES 1-50)

43. Plaintiff realleges and incorporates herein by reference, as though set forth in full, each and every allegation contained in Paragraphs 1 through 35, inclusive.

44. On or around March 5, 2012, Defendants published an article entitled "Special Report: Not the U.C.L.A. Way" in Sports Illustrated magazine, attached hereto as **Exhibit A**. This article

1 contained numerous falsehoods, exaggerations, and inaccuracies about Plaintiff Nelson as described
2 above.

3 45. In writing and publishing this article, Defendants created publicity that placed Plaintiff
4 in false light in the public eye.

5 46. This article created publicity in the sense of a public disclosure to a large number of
6 people because the story was a feature article in Sports Illustrated magazine, an international weekly
7 publication claiming a print circulation of several million. This magazine also has several million
8 additional readers who can access this article and others through its website.

9 47. The publicity created by Defendants placed Plaintiff in a false light in the public eye
10 because the article described Plaintiff as a violent, impulsive psychopath who regularly terrorized and
11 bullied his teammates and team staff members. The article contained falsehoods and inaccuracies
12 described above that incorrectly portrayed Plaintiff as a veritable monster.

13 48. The publicity created by Defendants' article was offensive and objectionable to Plaintiff
14 and to a reasonable person of ordinary sensibilities in that it charged Plaintiff with committing the
15 crimes of assault and battery, clearly exposed Plaintiff to hatred, contempt, ridicule, and obloquy,
16 charged Plaintiff with improper and immoral conduct, and caused Plaintiff to be shunned and avoided
17 by prospective basketball teams and employers.

18 49. Defendants published the article either with knowledge that it was false and defamatory
19 of the Plaintiff and/or, if the false and defamatory nature of it was not known to Defendants, with
20 reckless disregard for its obvious falsity and defamatory nature. Plaintiff is informed and believes that
21 Defendants recklessly and negligently failed to investigate the claims in the article, failed to adhere to
22 professional standards of reporting, and purposely misquoted and/or manipulated the context of public
23 statements made by Plaintiff, Plaintiff's mother, and various team players to paint a portrait of Nelson
24 as a violent and impulsive psychopath.

25 50. Plaintiff is informed and believes that Defendants intentionally chose to characterize
26 Plaintiff as the "villain" of the article to sell Sports Illustrated issues and increase advertising and sales
27 revenue for Defendants. Plaintiff is further informed and believes that Defendant Dohrmann in
28 particular chose to attack Plaintiff and U.C.L.A.'s basketball program because of personal animosity,

1 hostility, and ill will towards the university.

2 51. As a direct and proximate result of each Defendant's conduct, Plaintiff was damaged in
3 an amount to be proven at trial, but which Plaintiff is informed and believes will exceed \$10,000,000,
4 plus interest accrued and growing.

5 52. Each of Defendants' acts as described above was willful, oppressive, fraudulent, and
6 malicious, within the meaning of California Civil Code § 3294, thereby entitling Plaintiff to recover
7 exemplary and punitive damages against each Defendant in amounts according to proof at trial, which
8 Plaintiff is informed and believe will collectively exceed \$10,000,000.

9 **THIRD CAUSE OF ACTION**

10 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

11 **(AGAINST DEFENDANTS AND DOES 1-50)**

12 53. Plaintiff realleges and incorporates herein by reference, as though set forth in full, each
13 and every allegation contained in Paragraphs 1 through 35, inclusive.

14 54. Defendants' conduct toward Plaintiff, as alleged above, was outrageous and
15 unprivileged and was done either with the intent to cause emotional distress or with reckless disregard
16 of the probability of causing such emotional distress.

17 55. As a direct and proximate result of Defendants' aforementioned conduct, Plaintiff has
18 suffered and will continue in the future to suffer:

- 19 a. A substantial reduction in past and current income, and future income potential
20 in sums as may be shown according to proof;
- 21 b. A substantial injury and damage to his occupation and professional reputation in
22 a sum as may be shown according to proof;
23 and
- 24 c. Extreme humiliation, embarrassment, depression, sleeplessness, emotional pain,
25 and severe emotional distress which culminated in physical injury and bodily
26 injury, suffering, mental anguish, inconvenience, loss of enjoyment of life, and
27 other losses from the date of said acts all to Plaintiff's damage in a sum as may
28 be shown according to proof, but which Plaintiff believes will exceed

1 \$10,000,000.

2 56. Each of Defendants' acts as described above was willful, oppressive, fraudulent, and
3 malicious, within the meaning of California Civil Code § 3294, thereby entitling Plaintiff to recover
4 exemplary and punitive damages against each Defendant in amounts according to proof at trial, which
5 Plaintiff is informed and believe will collectively exceed \$10,000,000.

6 WHEREFORE, Plaintiff Reeves Nelson prays for judgment against Defendants and each of
7 them as follows:

- 8 1. For a public retraction and apology from Defendants for the publication of the
9 aforementioned article;
- 10 2. For general and compensatory damages, including prejudgment interest, at the minimal
11 amount of \$10,000,000, as well as interest accrued and growing;
- 12 3. For special damages according to proof, where permitted;
- 13 4. For punitive and exemplary damages, at the minimal amount of \$10,000,000, where
14 permitted;
- 15 5. For attorneys fees, where permitted;
- 16 6. For costs, where permitted;
- 17 and
- 18 7. For such other and further relief as the Court may deem just and proper.

19 DATED: May 23, 2012

FINK & STEINBERG

20 By

21 _____
22 Keith A. Fink
23 Olaf J. Muller
24 Attorneys for Plaintiff
25 REEVES NELSON
26
27
28

EXHIBIT A



Powered by Limelight

February 29, 2012

Special Report: Not the UCLA Way

By George Dohrmann, Sports Illustrated

This story appears in the March 5, 2012 issue of Sports Illustrated. Buy the digital version of the magazine here.

On the evening of Nov. 6, 2007, legendary former UCLA basketball coach John Wooden spoke to about 600 Bruins student-athletes and coaches. The occasion was the debut of The Wooden Academy, a seminar series in which former UCLA athletes and coaches returned to campus to describe how the tenets from Wooden's Pyramid of Success had helped them in college or life.

Wooden was 97 years old at the time. He spoke while seated in a padded chair on a small stage just off the baseline of the basketball court at Pauley Pavilion. To his left was a microphone stand with a long arm attached, which positioned the microphone so that Wooden could sit back in his seat.

Wooden talked about some of the players he had coached, and recited the 15 blocks in his Pyramid, which include cooperation, self-control, team spirit and intentness. Wooden also used a metaphor that will ring familiar to readers of his books. Think of a team as a train, he said, and its star player as the locomotive. There is much more to a train than just that engine. If any part of a train fails, if just one nut or bolt gives away, the whole chain of cars can derail.

At the time of Wooden's talk, UCLA's basketball program was one of the smoothest-running trains in the country. The Bruins had made consecutive Final Fours and would reach a third in 2008 behind freshman Kevin Love, the team's new locomotive, who was in the audience that November evening. UCLA coach Ben Howland would join Tom Izzo and Mike Krzyzewski as the only active coaches to lead teams to three straight Final Fours. Howland's reputation for teaching defense and instilling discipline made him appear to be cut from Wooden's cloth.

But then the program started veering off the rails. Two years ago the Bruins went 14-18, only the third time since 1948 (the year Wooden was hired) that they had finished with a losing record. They entered this season ranked 17th in the nation but through Sunday were only 16-13 (9-7 in the weak Pac-12) and needed to win the conference tournament to avoid missing the NAAs for the second time in three years.

UCLA's fall has been something of a mystery. It has most often been blamed on players jumping early to the NBA (six Bruins have done so in the last four years, including Love and fellow first-round picks Russell Westbrook and Jrue Holiday), players transferring (five have departed) and even a supposed dearth of quality big men coming out of high schools on the West Coast. Inside the team, however, more fundamental problems have been at work, eroding the sense of unity, leading some players to leave the program and sending the blocks of Wooden's Pyramid tumbling down.

Over the last two months SI spoke with more than a dozen players and staff members from the past four Bruins teams. They portrayed the program as having drifted from the UCLA way as Howland allowed an influx of talented but immature recruits to undermine team discipline and morale. Fistfights broke out among teammates. Several players routinely used alcohol and drugs, sometimes before practice. One player intentionally injured teammates but received no punishment.

Such problems are often symptomatic of underachieving teams, and UCLA provides a fascinating case study. The former players and staff members who spoke to SI offer a detailed inside account of how seemingly minor problems, if left unaddressed, can quickly sabotage even a storied program led by one of the nation's most respected coaches. The Bruins' struggles tell a cautionary tale of the risks of recruiting hyped players, the challenges of managing recalcitrant teenagers and the consequences of letting discipline and accountability break down. Most of all, the problems at UCLA underline the precariousness of college basketball success.

program has always had talent. Steve Lavin, Howland's predecessor, twice landed the nation's No. 1 recruiting class. Lavin's teams were said to lack discipline, however, and after a 10-19 finish in 2002-03, UCLA hired Howland.

Howland, now 54, had built his reputation at Pittsburgh as a coach whose teams not only won -- he was named national coach of the year in 2002 after guiding the Panthers to the Sweet 16 -- but also were highly disciplined. He'd been a vocal, tough-minded high school guard in Southern California and later at Weber State, and he liked players who shared his aggressive, hardworking approach. When Howland arrived at UCLA, he earned praise in the media for bringing much-needed order.

The core of the Bruins' Final Four teams came from Howland's first two recruiting classes: Arron Afflalo, Jordan Farmar, Lorenzo Mata-Real and Josh Shipp, all 2004 recruits; and Alfred Aboya, Darren Collison, Luc Richard Mbah a Moute and Michael Roll from 2005. Not one was considered a surefire NBA player. In Rivals.com's national rankings of high school prospects, only Farmar made the top 25. Most others failed to crack the top 50 (Collison was No. 100) or were barely ranked at all.

In an era in which coaches spend considerable time managing athletes with inflated egos, Howland assembled a mostly selfless group. The players were also mature beyond their years, a vital attribute given that Howland was neither a nurturer nor a player's coach. Other than during practices and games, he had little contact with his athletes, according to players. He showed up moments before a workout began and was gone before players paired off to shoot free throws at the end. Several team members say that his approach was how they imagined an NBA coach would run a team.

The task of indoctrinating a new player -- such as Westbrook, another unranked recruit, who enrolled in 2006 -- fell to the veterans. It was a team of prefects, the protectors of the UCLA dynamic, who looked out for each other, making sure that no one got into trouble, that no one threatened what they were trying to accomplish or what UCLA has always been about. They were a tight group. If they went out, to the movies or a party, they were 15 strong.

That kind of camaraderie is not unusual on good teams, but Howland's former players say he had very little to do with instilling it. He focused on basketball strategy, not team building. Each of the players who spoke to SI said they found Howland socially awkward and disapproved of the verbal abuse they say he directed at his staff, the student managers and the weakest players. One player said if he saw Howland waiting for the elevator he would take the stairs.

The players were puzzled by some of their coach's idiosyncrasies. Howland seemed obsessed with the temperature in the film room. If it was not exactly 76° a student manager was certain to feel Howland's wrath. The water bottles handed to him had to be just cold enough and not too large.

He occasionally kicked players out of pregame walk-throughs held in hotel ballrooms if the players weren't executing properly. Two players recall being tossed, on different occasions, for failing to get low enough on defense even though they were wearing jeans that constricted their movements.

In a game during the 2007-08 season, several players on the bench noted Howland's frustration with the shot selection of Westbrook, whose freelancing had resulted in several baskets. But rather than substituting for him, Howland informed one of the officials that Westbrook was wearing socks bearing an NBA logo, which violated NCAA uniform guidelines. Howland told the official he had an obligation to remove Westbrook from the game because of his socks. The official claimed to be unaware of the rule and let play continue.

As focused on detail as Howland was, his players had the freedom to enjoy the perks of being a Bruin during UCLA's run to the three consecutive Final Fours. There were nights out with current and former NBA players, television stars and models. One evening the partying started at the Beverly Hills mansion of a wealthy UCLA fan. The Bruins were then chauffeured in a Rolls-Royce to a West Hollywood club, where several players were ushered past a long line of people and given VIP treatment at a table in the back. Says one player, "We'd go back to the campus bars and students would say, 'Where have you been?' We'd be like, 'If you only knew.'"

The players on those Final Four teams were a mature group, however, and they showed self-restraint. They knew that to achieve their goals on the court, they had to discipline themselves off it. That simple realization can separate winning teams from losing teams. And at UCLA, it did.

After its 2008 trip to the Final Four, UCLA lost Love, Westbrook and Mbah a Moute to the NBA, and Mata-Real to graduation. Swingman

Chace Stanback, who had spent his first college season tethered to the bench, transferred to UNLV.

Such an exodus would decimate most programs. But this was UCLA, and the Bruins reloaded with the nation's No. 1 recruiting class. The 2008 Baby Bruins consisted of three combo guards -- Holiday, Malcolm Lee and Jerime Anderson -- power forward Drew Gordon and center J'mison Morgan. Holiday was the highest-ranked recruit (No. 2 overall), but all were among the nation's top 50 prospects, a distinction not even Michigan's famed Fab Five class of 1991 could claim.

Howland had never signed a group so talented and so widely expected to succeed. Holiday was called a more polished version of Westbrook; Gordon was touted as a better athlete than Love; Morgan was likened to former alltime great UCLA centers Lew Alcindor and Bill Walton.

The recruits were famous before they played a game. They would walk into a party on campus and, as one player put it, "the place would just stop."

When practices began in October, however, it was quickly apparent that while the Baby Bruins' talent was undeniable, their levels of dedication varied. Some of the newcomers clearly didn't appreciate the commitment needed to succeed at the top level of the college game.

The seven team members from that year who spoke to SI divided the freshmen into two camps. Holiday and Lee were serious and professional; they had fun off the court but never went too far. Anderson, Gordon and Morgan, by contrast, took advantage of the freedom of being in college and did what many freshmen do. They partied. The trio regularly drank alcohol and smoked marijuana, sometimes before practice, according to multiple teammates. The three players' limited time on the court -- Gordon played the most, averaging just under 11 minutes a game -- seemed to give them license to do more partying as the season progressed. (Anderson, Gordon and Morgan declined to comment.)

Several former team members who spoke to SI cautioned against demonizing the misbehaving freshmen. "We all partied when we first went to college," one says. But while asking for some perspective on the freshmen's behavior, former players said their actions affected the team's unity and performance. Practices were often sloppy because of the three freshmen's immaturity and lack of effort, and some of the Baby Bruins chafed at being treated as anything but the stars they were coming out of high school.

Older players tried to counsel them but with little success. Gordon, for one, was very emotional and reacted harshly whenever criticized, several former teammates say. He often disrupted practices and during one session set an illegal screen on Collison that so angered Collison that the two had to be separated.

Gordon was not punished for that incident, one of many occasions when Howland didn't discipline the freshmen for conduct that was detrimental to the team. One player sensed that Howland was waiting for things to work themselves out; others say they felt that Howland was reluctant to discipline the freshmen out of trepidation that the best of them would transfer or leave early for the NBA. (Citing federal privacy laws, a university spokesperson said Howland would not discuss his handling of specific players with SI.)

At one point in late 2008, Howland lectured the team about drinking, saying that he didn't consume alcohol during the season and asking that the players show the same respect for the program. Reminders to curtail the partying came more frequently from assistant coaches.

On the final day of 2008, Howland met with the team and told players not to go out on New Year's Eve. The Bruins had an early-morning practice scheduled for New Year's Day and were departing for Oregon in the afternoon. Howland stressed that it was time to get serious.

Three members of the team, not all of them freshmen, ignored Howland's orders and attended a giant rave at the Los Angeles Sports Arena. "We did what you do at a rave: We took Ecstasy," says one of the players. The trio did not get back to Westwood until between 4 and 5 a.m. and barely slept before arriving at Pauley Pavilion for an 8 a.m. practice. The players bragged about their night to teammates and commented on how they were still feeling the effects of the Ecstasy.

A few days later an assistant coach phoned the players who attended the rave and asked if they had gone out on New Year's Eve. They denied it, but soon afterward each was ordered to submit to a drug test. "I took something that was supposed to get [the drugs] out of my system," says one player. "I never heard anything about the results [of the test], so it must have worked."

From the outside, UCLA did not appear to be a program in disarray. Veterans of the 2008 Final Four team, including Collison, Aboya, Shipp and Nikola Dragovic, combined with Holiday to help UCLA finish second in the Pac-10. But it was a team divided from start to finish. Just before the postseason, in a last ditch effort to create team unity, the upperclassmen organized a bowling night, but the freshmen blew it off.

UCLA lost to Villanova by 20 in the second round of the 2009 NCAA tournament, ending the Final Four streak. Many on that team would look back on the season as more than just a lost opportunity. Howland had failed to correct discipline problems that would compound themselves in the years ahead.

"Guys drinking, guys doing drugs, guys not taking practice seriously, guys fighting," said one player. "You won't find that on the Pyramid of Success."

On April 15, less than a month after the season ended, Howland summoned to his office one of the student managers, a sophomore who was known to party with the players. The manager had mentioned to an assistant coach that some players drank and smoked marijuana too often during the season and that they needed to get more serious for UCLA to improve.

Howland told the manager that he needed to know who those players were and exactly what they were doing. The manager refused to name names, so Howland told the manager that if he didn't tell him, he would be terminated.

"I tried to be vague at first, told him some of the freshmen had problems, but he kept on me," says the manager. "I was just a college student, and Coach Howland is telling me I *have* to tell him everything."

The manager eventually told Howland what he knew, but the coach still terminated him. According to the manager, Howland said, "You are just as guilty as the players."

Howland told SI he couldn't discuss any specifics of the situation but said, "In my 18 years as a head basketball coach and nine years as the head basketball coach at UCLA, if I found out that a student manager was partying with some of our players, I would have told him to leave the program. In our program the managers are more closely related to the coaching staff than they are to the student-athletes. In fact, many of my former managers are now successful coaches, and I'm very proud of what they have accomplished."

Several team members were upset by Howland's treatment of the manager, who was devoted to UCLA basketball and, in the words of one player, "would come in and rebound for guys at 3 a.m. if they asked him to." None of the team members from that season who spoke to SI knew of anyone else being punished as a result of the manager's revelations. A few heard that Howland met with a couple of players and told them to clean up their acts, but the players knew of no further action by the coach.

In the fall of 2009, during a routine practice drill, UCLA freshman Mike Moser ran through a team of defenders and was suddenly hit in the chest by a forearm and shoulder that nearly knocked him to the ground. It was the second time Moser had been the victim of an illegal screen from fellow freshman Reeves Nelson, and he'd had enough. Moser told Nelson that if he did it again he would punch him in the face. The drill was reset, and in the words of one player who was present, "Mike comes across and Reeves just hits him again. Mike wasn't a guy who would back down. He squared up and they went at."

Fights in practice happen; competitiveness gets the better of players. But according to team members, UCLA had an alarming number of those to begin the season. A year after bringing in the Baby Bruins, Howland had added five more freshmen, all frontcourt players: Moser, Nelson, Tyler Honeycutt, Brendan Lane and Anthony Stover. Only Holiday, who left for the NBA, was gone from the previous year's group, which meant nine of the team's 13 scholarship athletes were underclassmen. With so many gifted young athletes on the team, a dustup or two could be expected in the competition for playing time. But when does a fight signal larger issues?

Is it when the scuffle occurs away from practice, like the one between Nelson and Gordon at a teammate's apartment? Gordon ended up with a black eye. Is it when players are involved in multiple fights? Gordon and Moser had fought previously during a workout. Is it when a player says Howland made light of one of his players receiving a punch to the face? After what happened between Moser and Nelson, one player says that Howland jokingly remarked to him that Howland had been wanting to hit Nelson for weeks. (When asked about the incident, Howland said, "I have never so much as contemplated striking a player in my 30 years as a coach. To think otherwise is ridiculous.")

Even with all the fisticuffs, team members didn't consider those among the lowest moments of the Bruins' 2009-10 season. "Of course you don't want guys fighting," says one, "but we had so much that went wrong that year that it is hard to make a big deal about it now."

As in the previous season, the problems started almost immediately. There were only four upperclassmen on scholarship, and they all lived away from campus. The incoming freshmen started hanging out with the teammates who were closer to their age and living near campus, but once again, not all the freshmen were the same. The mild-mannered Lane got a girlfriend early in the school year and didn't party often

with his classmates. Moser and Honeycutt went out, but like Holiday and Lee, they did so cautiously. At the other end of the spectrum, however, were Nelson and Stover, who partnered with Gordon, Anderson and Morgan to form a crew that would further erode team discipline and unity.

All the distractions from the previous school year continued and the partying increased. As a result, practices were even sloppier, the difference between the few dedicated players still in the program and the underclassmen now plainly visible. If you walked into practice, you would see at one basket Mike Roll shooting free throws, using the same routine every time, taking every shot seriously; on another basket Nelson and Stover would be shooting their free throws with one hand or fading away. (Stover declined to comment.)

One underclassman upset about his lack of playing time says he stopped wearing his jersey under his warmups during games. When Howland ordered him to the scorer's table during garbage time in one game, the player responded, "Sorry, Coach, I don't have my jersey on."

"It's something I can't believe I did," says the player. "But there was so much crazy [stuff] going on it didn't seem that crazy then."

Nelson was the ringleader among the freshmen. Because of his toughness, the 6'8" forward from Modesto, Calif., was called "the prototypical Ben Howland player" by ESPN.com when he signed with the Bruins, but teammates came away with a different impression of him after only a few practices. Nelson could be a nice guy, but he had what one player calls "this crazy side."

Nelson often reacted to hard fouls or calls against him in practice by committing violent acts against teammates. He did not deny to SI that he would stalk his targets, even running across the court, away from a play, to hit someone.

Once, Nelson got tangled up with forward James Keefe while going for a rebound. Keefe was playing with a surgically repaired left shoulder, and Nelson pulled down suddenly on Keefe's left arm. That reinjured Keefe's shoulder, and he missed several weeks. Later in the season Nelson hacked walk-on Alex Schrempf, the son of former NBA player Detlef Schrempf, from behind on a breakaway, knocking Schrempf to the ground. The back injury Schrempf suffered sidelined him for months. In another workout Nelson threw an elbow at Lane after the whistle, injuring Lane's ribs.

Walk-on Tyler Trapani was another Nelson victim. After Trapani took a charge that negated a Nelson dunk, Nelson went out of his way to step on Trapani's chest as he lay on the ground. Trapani is John Wooden's great-grandson. (Nelson confirmed all these incidents to SI and expressed his regret, saying, "On all that stuff, I have no trouble admitting that I lost control of my emotions sometimes. I take responsibility for my actions. I'm really just trying to learn from the mistakes I made on all levels.")

After each of the incidents, Howland looked the other way. One team member says he asked Howland after a practice why he wasn't punishing Nelson, to which he said Howland responded, "He's producing."

But at what cost? Nelson was hardly the player around whom to build a team. He was a classic bully, targeting teammates who weren't as athletically gifted as he and tormenting the support staff. At the end of practice, he would punt balls high up into the stands at Pauley Pavilion, turn to the student managers and say, "Fetch." Nelson frequently talked back to the assistant coaches. When they told him to stop, he would remark, "That's how Coach Howland talks to you."

Many players say Howland degraded his assistants, but only Nelson used that as license to treat the assistants with disrespect. Donny Daniels, a member of Howland's staff since Howland arrived in Westwood, would leave after the season to take the same job at Gonzaga. One player says that when he asked Daniels why he was departing, Daniels kiddingly responded that if he had to coach Nelson for one more season, he would kill himself. (Daniels, through his lawyer, denied making that statement.)

Nelson showed Howland only slightly more respect. By his own admission, he often ignored the head coach's phone calls, and Howland resorted to calling one of Nelson's roommates, asking him to coax Nelson onto the line.

When asked by SI why he didn't discipline Nelson, Howland said in a statement: "I firmly believe in the philosophy of giving all of my players the chance to do things the right way. There have been challenges with some student-athletes during my tenure here at UCLA, and we have utilized plenty of resources to help them, the specifics of which very few people would know anything about."

But Nelson's behavior -- and Howland's tolerance of it -- undercut team morale. Combined with the partying of the other freshmen and the three sophomores, it torpedoed the season. UCLA won four of five against weak competition to open the year but then lost six of its next

seven, falling to Portland (by 27), Long Beach State (by 11) and Mississippi State (by 18).

Team members say that if Howland had taken a harder line with his young players, most of them would have come around. "But with Reeves," one player says, "the only thing to do was to kick him off the team."

Instead, another player was sent packing. In early December after Gordon departed, Howland told the *Los Angeles Times*: "We have expectations of how our players represent the university on and off the court. When those standards aren't met, there are consequences." Gordon had certainly done enough to warrant getting kicked off the team, but team members felt it was not his hard-partying ways that sealed his exit. Gordon was the rare player who second-guessed Howland's coaching, both in practice and to the media. Just before Gordon left the team, he and Howland had a heated exchange in practice over the way Howland wanted Gordon to defend a certain play. The message some players took from Gordon's departure was this: At UCLA you could fight, you could drink alcohol and do drugs to the point that it affected your performance, but the one thing you could not do was question Howland's knowledge of the game.

Gordon's exit failed to change the culture of the program, and New Year's Eve was once again a flash point. Several underclassmen had arranged for a party bus to shuttle them around town, but at the last minute Howland instituted a bed check. An assistant coach would visit the players' apartments and dorm rooms and make certain no one had gone out.

When informing the players of the bed check, Howland remarked, "So there will be no party bus," which led some underclassmen to conclude that they had an informant in their midst. Nelson thought that Honeycutt, one of his roommates, was the rat, and he got his revenge. A short time later, Nelson returned home from a night of partying, piled Honeycutt's clothes on Honeycutt's bed, and then urinated on the clothes and flipped the bed over. When asked by SI about the incident, Nelson said, "I would dispute that that is exactly what happened, but I understand people would say that is what happened. But I think, most of all, you should know that Tyler and I are still friends."

It didn't appear that Nelson was punished for the incident, but players say that Honeycutt was given his own single dorm room. (Through his agent, Honeycutt declined to comment.)

A few months later, when UCLA lost to Cal by 13 in the second round of the Pac-10 tournament, the careers of the program's three seniors, Keefe, Roll and Dragovic, came to a close. For the following season, the only returning scholarship players would be from the two recruiting classes that had caused so much discord.

The program now belonged to them.

By all accounts the 2010-11 season was an improvement. According to five people associated with the team, the atmosphere was better. In March 2010, Howland announced that Morgan was being dismissed from the team for undisclosed reasons, leaving only Anderson and the dependable Lee from the Baby Bruins class. UCLA lost Moser, who transferred to UNLV, but forwards David and Travis Wear transferred in from North Carolina and would be eligible to play the following season. Joining them was a four-man class of recruits. Center Joshua Smith's indolence was a worry, but guards Tyler Lamb and Matt Carlino were hardworking and respectful, and the final recruit, guard Lazerio Jones, was the school's first significant junior college transfer since 1986.

UCLA opened the season 5-4, including an embarrassing loss to Montana at Pauley Pavilion. But the Bruins loaded up on victories against nonconference lightweights and took advantage of another down year in the Pac-10 to finish third in the conference at 13-5 (23-11 overall). UCLA returned to the NCAA tournament, a sign of recovery even though the Bruins lost to Florida in the round of 32.

"It was better," says one team member, "but remember: Reeves was still there."

From the first practice, Nelson's treatment of Carlino was a divisive issue. Carlino suffered a concussion during the preseason that caused him to miss the first three games. Nelson ridiculed Carlino for letting the injury sideline him. He told Carlino he didn't belong at UCLA and wasn't any good. He would yell at Carlino to leave the locker room, calling him "concussion boy." When Carlino returned to workouts, Nelson would go out of his way to set a screen on Carlino so he could hit him. Eventually, players say, Carlino dreaded practice. It was of little surprise when he left UCLA midway through the season and transferred to BYU.

After Carlino left, there was a team meeting at which Howland said he couldn't respect a quitter. "But everyone knew why Matt left," says one player. "He didn't want to keep sitting on the bench, but most of all he didn't want to be around Reeves anymore. That wasn't quitting."

That was just smart."

Carlino became eligible for BYU midway through this season and immediately became a standout. Through Sunday, he was averaging 13.0 points and 4.7 assists. He joined the list of recent players who have thrived after leaving Westwood, most for schools in the Mountain West. At week's end Moser was the leading scorer (14.2 points per game) for No. 17 UNLV, and was ranked sixth in the nation in rebounds (11.0 per game). Chace Stanback was the Runnin' Rebels' second-leading scorer (13.6 points per game). Gordon was averaging a double double (12.5 points, 10.9 rebounds) for New Mexico (22-6). Morgan has had the least impact of the former Bruins, but he did appear in all 31 of Baylor's games last year, starting 14. (He is redshirting this season.)

Early in 2011, after the conference season began, players noticed a subtle shift in how Howland handled the mercurial Nelson. "[Howland] always gave Reeves the benefit of the doubt on foul calls in practice so Reeves wouldn't lose it and be even more disruptive," says one team member. "But when Reeves started going up against the Wear twins, Coach would call it straight. That got to Reeves. He started yelling more at Coach, showing him up."

Nelson finished his sophomore season as the team's leading scorer (13.9) and rebounder (9.1) and was selected first-team All-Pac-10. He was a preseason first-team pick last fall, but he lasted only seven games.

On Nov. 14, Howland suspended Nelson for being late to a team meeting and exhibiting other behavior that was deemed insubordinate. Howland reinstated Nelson two days later, but on Nov. 19 Nelson missed a team flight to Hawaii. Howland suspended him again on Dec. 6, a move that was roundly criticized by the media for being inadequate. Three days later, Howland dismissed Nelson from the program.

Nelson's mother, Sheila, told the *Los Angeles Times* that she wished Howland had been stricter with her son earlier in his career. "I think what my mom was saying was that when I went to college I was just 17," Nelson, who is back in Modesto training for the NBA draft, told SI. "I'm not trying to make excuses for what I did, but I got into some weird behavior patterns, and I think my mom was saying that if instead of one big punishment at the end, what if there had been smaller punishments along the way." In a December interview with the *Los Angeles Times*, Howland acknowledged that he had made mistakes with Nelson.

UCLA won five in a row against soft competition following Nelson's exit, but when conference play started, the Bruins proved to be only a middle-of-the-pack team. Smith, UCLA's most gifted player, was a disappointment. He has admitted to a lack of motivation, but players say that Howland also has babied him, allowing him to miss meetings and arrive late or unprepared for workouts. "Same thing as before," says a player. "Josh is a star and so [Howland] isn't holding him accountable." (Howland declined to discuss his handling of Smith.)

Whether Howland is capable of getting the program back on track is the question of the moment in Westwood. The capital he built up during the Final Four years would seem to have been spent. His winning percentage over the past three seasons (.558) is worse than that of the much-maligned Lavin during his final three years (.574).

UCLA athletic director Dan Guerrero, who through a spokesperson declined SI's interview request, told ESPN.com in January, "I need Ben Howland. Why would I even think about looking at someone else?" He added, "By his own admission, [Howland] made some mistakes. But I'm going to work with him. I'm not going to crucify him for those mistakes. Because Ben Howland is a hell of a coach, and anyone who understands basketball, anyone that's been around him, that knows the game, has the utmost respect for what he does as a coach. ... We need to turn it around, and we all get that. But we will."

UCLA basketball has always had its own special shine, and any tarnish has never been tolerated for long. As tempting as it is to blame immature players -- and they deserve a heavy dose -- the team members who spoke to SI were unanimous in their belief that leadership from Howland would have prevented or at least curtailed the damage. Says one, "Can you imagine the same thing happening at Duke? Can you imagine players getting away with that stuff under Coach K?"

That is hard to imagine, just as it would have been hard to envision four years ago that UCLA would be in its current state. Back then the team was united, the players mature and humble. Who could have predicted a train running so smoothly would go off the rails? Who could have foreseen such a departure from the UCLA way?

Find this article at:

<http://sportsillustrated.cnn.com/vault/article/w eb/COM1195462/index/index.htm>

☐ Check the box to include the list of links referenced in the article.

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EXHIBIT B

DECLARATION OF DAVID WEAR

I, David Wear, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for U.C.L.A. I transferred to U.C.L.A. in 2010, and have played basketball for U.C.L.A. since. Prior to playing for U.C.L.A., I attended and played basketball for the University of North Carolina for the 2009-2010 season.


3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated ("SI") magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am unaware of any attempt by SI or Dohrmann to contact me regarding this article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. The article's description of Nelson's behavior toward teammate Matt Carlino is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that Carlino "dreaded practice" because of Nelson. I personally understand and believe that Carlino transferred to B.Y.U. not because of Nelson's behavior but because Carlino believed he was not receiving sufficient playing time during games.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed on May _____, 2012 at Los Angeles, California.

3
4 
David Wear

DECLARATION OF JERIME ANDERSON

I, Jerime Anderson, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for U.C.L.A. I joined the U.C.L.A. basketball team in 2008.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

7. The article's description of Nelson's behavior toward teammate Tyler Trapani ("Trapani") is false. I attended the practice at which Trapani was injured. Nelson did not go "out of his way to step on Trapani's chest as he lay on the ground" during team practice.

8. The article's description of Nelson's behavior toward teammate James Keefe ("Keefe") is false. I attended the practice at which Keefe's shoulder was re-injured. This injury was not caused by any intentional conduct by Nelson against Keefe.

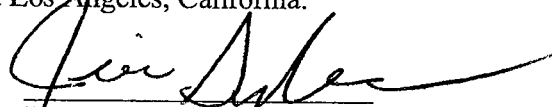
1 9. The article's description of Nelson's behavior toward teammate Drew Gordon
2 ("Gordon") is false. They have never had a fight, not at a teammate's apartment or anywhere else, nor
3 am I aware of Nelson ever giving him a black eye from a fight or otherwise.

4 10. The article's description of Nelson's behavior toward teammate Mike Moser ("Moser")
5 is false. I never saw Moser fight with Nelson not at practice or anywhere else, nor did I see or hear
6 Moser threaten to punch Nelson in the face.

7 11. The article's description of Nelson's behavior toward teammate Alex Schrempf
8 ("Schrempf") is false. I attended the practice during which Schrempf's hip was injured. Nelson did not
9 intentionally attack Schrempf during practice by knocking him to the ground from behind, nor did
10 Schrempf suffer a back injury as a result of his in-play interactions with Nelson.

11 12. The article's description of Nelson's behavior toward teammate Matt Carlino
12 ("Carlino") is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him
13 "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that
14 Carlino "dreaded practice" because of Nelson. My understanding is that Carlino transferred to B.Y.U.
15 not because of Nelson's behavior but because Carlino wanted more playing time during games.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct. Executed on May _____, 2012 at Los Angeles, California.

18 
19 Jerime Anderson

DECLARATION OF DREW GORDON

I, Drew Gordon, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for the University of New Mexico Lobos, having entered the N.B.A. Draft as a senior. Prior to playing for the Lobos, I attended and played basketball for U.C.L.A. during the 2008-2009 and 2009-2010 seasons.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article.

5. I have known and shared a close friendship with Reeves Nelson ("Nelson") since we were in seventh grade.

6. During my time at U.C.L.A., I regularly attended practice and team games with Nelson. I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

7. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

8. The article's description of Nelson's behavior toward me is false. We have never had a fight, not at a teammate's apartment or anywhere else, nor has Nelson ever given me a black eye from a fight or otherwise.

1 9. The article's description of Nelson's behavior toward team mate Mike Moser ("Moser")
2 is false. I never saw Mike Moser fight with Nelson not at practice or anywhere else, nor did I see or
3 hear Moser threaten to punch Nelson in the face.

4 10. The article's description of Nelson's behavior toward teammate Tyler Trapani
5 ("Trapani") is false. I attended the practice at which Trapani was injured. Nelson did not go "out of
6 his way to step on Trapani's chest as he lay on the ground" during team practice.

7 11. The article's description of Nelson's behavior toward teammate James Keefe is false. I
8 attended the practice at which James Keefe's shoulder was re-injured. This injury was not caused by
9 any intentional conduct by Nelson against Keefe.

10 12. The article's description of Nelson's behavior toward teammate Matt Carlino
11 ("Carlino") is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him
12 "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that
13 Carlino "dreaded practice" because of Nelson. I believe that Carlino transferred to B.Y.U. because he
14 wanted more playing time during games, not because of anything Nelson did.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct. Executed on ~~April~~ ^{May} 8, 2012 at _____.

17 May

18 
Drew Gordon

DECLARATION OF LARRY DREW, JR.

I, Larry Drew, Jr., declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete presently attending U.C.L.A. I joined the U.C.L.A. basketball team in 2011 after transferring to U.C.L.A. from the University of North Carolina.


3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am not aware of any attempts by Dohrmann or anyone else from Sports Illustrated to contact me regarding this article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 8th, 2012 at Los Angeles, California.


Larry Drew, Jr.

DECLARATION OF MATT DEMARCUS

I, Matt DeMarcus, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete presently attending U.C.L.A. I joined the U.C.L.A. basketball team in 2008.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am aware of no attempts by Dohrmann or anyone else at Sports Illustrated to contact me regarding this article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

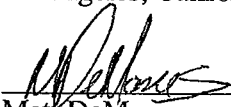
7. The article's description of Nelson's behavior toward teammate James Keefe is false. I attended the practice at which James Keefe's shoulder was re-injured and recall the specific play when Keefe's shoulder was injured. This injury was not caused by any intentional conduct by Nelson against Keefe.

8. The article's description of Nelson's behavior toward teammate Matt Carlino

1 ("Carlino") is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him
2 "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that
3 Carlino "dreaded practice" because of Nelson. My understanding is that Carlino transferred to B.Y.U.
4 not because of Nelson's behavior but because Carlino wanted more playing time during games.

5 9. The article's description of Nelson's behavior toward team mate Mike Moser ("Moser")
6 is false. I never saw Mike Moser fight with Nelson not at practice or anywhere else, nor did I see or
7 hear Moser threaten to punch Nelson in the face.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct. Executed on May 7, 2012 at Los Angeles, California.

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11 Matt DeMarcus
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DECLARATION OF MALCOLM LEE

I, Malcolm Lee, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a professional basketball player presently playing for the N.B.A.'s Minnesota Timberwolves. I entered the N.B.A. draft in 2011 and was initially drafted by the Chicago Bulls before being traded to the Timberwolves on draft night. Prior to playing professional basketball, I played as a student-athlete for U.C.L.A.'s basketball team between 2008 and 2010.


3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. not aware of any attempts to contact him

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt" on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 14, 2012 at 11:40


Malcolm Lee

DECLARATION OF BLAKE ARNET

I, Blake Arnet, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student presently attending U.C.L.A. I joined the U.C.L.A. basketball team in 2008 and played during the 2008-2009, 2009-2010, and 2010-2011 seasons.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I spoke with Dohrmann regarding this article prior to it being published.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). During my telephonic conversation with Dohrmann, Dohrmann told me that he had heard that Nelson intentionally hurt and abused his teammates during and after practice sessions. I explained to Dohrmann that any such claims were incorrect. I told Dohrmann that I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice.

6. I explained to Dohrmann that I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it."

7. The article's description of Nelson's behavior toward teammate Tyler Trepani ("Trepani") is false. I attended the practice at which Trepani was injured. Although Nelson did fall on Trepani during a practice drill, Nelson did not go "out of his way to step on Trepani's chest as he lay on the ground." I explained this to Dohrmann during our conversation.

8. Dohrmann told me that he heard that Nelson intentionally pulled on teammate James Keefe's ("Keefe") shoulder during practice, causing him serious injury. I told Dohrmann that I did not attend the practice at which Keefe's shoulder was re-injured and could not comment on this event.

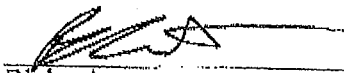
9. Dohrmann told me that he heard that Nelson fought with teammate Drew Gordon

1 ("Gordon"). I told Dohrmann that I was not present for any fight between Nelson and Gordon.

2 10. Dohrmann told me that he heard that on New Years Eve, Nelson urinated on teammate
3 Tyler Honeycutt's ("Honeycutt") bed after flipping the mattress over and piling Honeycutt's clothes on
4 top. I told Dohrmann that this was the "first time" I had ever heard this story or anything like it.

5 11. Dohrmann told me that he heard that Nelson intentionally injured teammate Alex
6 Schrempf's ("Schrempf") hip during practice by knocking him to the ground from behind. I told
7 Dohrmann that I did not recall any practice session during which Nelson injured Schrempf by knocking
8 him to the ground from behind or otherwise.

9 I declare under penalty of perjury under the laws of the State of California that the foregoing is
10 true and correct. Executed on May 22nd, 2012 at Los Angeles, California.

11 
12 Blake Arnet

DECLARATION OF LAZERIC JONES

I, Lazeri Jones, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete presently attending U.C.L.A. I transferred to U.C.L.A. from John A. Logan College and joined the U.C.L.A. basketball team in 2010.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am not aware of any attempts by Dohrmann or anyone else from Sports Illustrated to contact me regarding this article.

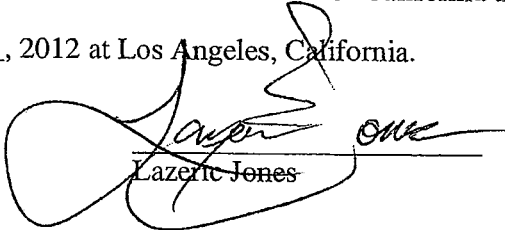
5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

7. The article's description of Nelson's behavior toward teammate Matt Carlino ("Carlino") is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that Carlino "dreaded practice" because of Nelson. I believe that Carlino transferred to B.Y.U. because he wanted more playing time during games, not because of anything Nelson did.

1 8. The article's description of Nelson's behavior toward teammate Alex Schrempf
2 ("Schrempf") is false. I attended the practice at which Schrempf's hip was injured. Nelson did not
3 intentionally attack Schrempf during practice by knocking him to the ground from behind, nor did
4 Schrempf suffer a back injury as a result of his in-play interactions with Nelson.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing is
6 true and correct. Executed on May 7, 2012 at Los Angeles, California.

7
8 
9 Lazerio Jones

DECLARATION OF TYLER LAMB

I, Tyler Lamb, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete presently attending U.C.L.A. I began attending U.C.L.A. and joined the basketball team in 2010.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am not aware of any attempts by Dohrmann or anyone else at Sports Illustrated to contact me regarding this article.

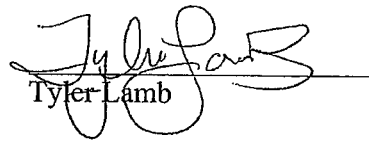
5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

7. The article's description of Nelson's behavior toward teammate Matt Carlino ("Carlino") is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that Carlino "dreaded practice" because of Nelson. I believe that Carlino transferred to B.Y.U. because he wanted more playing time during games, not because of anything Nelson did.

1 8. The article's description of Nelson's behavior toward teammate Alex Schrempf
2 ("Schrempf") is false. I attended the practice during which Schrempf's hip was injured. Nelson did
3 not intentionally attack Schrempf during practice by knocking him to the ground from behind, nor did
4 Schrempf suffer a back injury as a result of his in-play interactions with Nelson.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing is
6 true and correct. Executed on May 7, 2012 at Los Angeles, California.

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DECLARATION OF TYLER HONEYCUTT

I, Tyler Honeycutt, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a professional basketball player presently playing for the N.B.A.'s Sacramento Kings. I was drafted by the Kings in the 2011 N.B.A. draft. Prior to playing for the Kings, I attended and played basketball for U.C.L.A. for two seasons between 2009 and 2011.

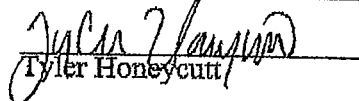
3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated ("SI") magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article.

5. I understand that the article references a New Year's Eve incident between me and my former teammate and roommate Reeves Nelson ("Nelson"). Contrary to the story told in Dohrmann's and SI's article, Nelson did not pile my clothes onto my bed on New Year's Eve, and he certainly did not urinate on my clothes. I did not request to be moved to a single dorm room because of any conduct by Nelson. On the contrary, Nelson played a minor college prank on me, throwing some jolly rancher candy and baby powder on my bed and flipping over the mattress when I left our dorm room.

6. During my time at U.C.L.A., I regularly attended practice and team games with Nelson. I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on April 14, 2012 at LOS ANGELES, CALIFORNIA


Tyler Honeycutt

DECLARATION OF J'MISON MORGAN

I, J'mison Morgan, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath. (may not be able to testify)

2. I am a student-athlete presently attending and playing basketball for Baylor University. Prior to transferred to Baylor in 2010, I attended and played basketball for U.C.L.A. during the 2008-2009 and 2009-2010 seasons.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

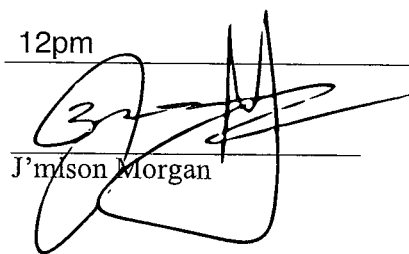
7. The article's description of Nelson's behavior toward team mate Mike Moser ("Moser") is false. I never saw Mike Moser fight with Nelson not at practice or anywhere else, nor did I see or hear Moser threaten to punch Nelson in the face.

8. The article's description of Nelson's behavior toward teammate James Keefe is false. I attended the practice at which James Keefe's shoulder was re-injured and recall the specific play when

1 Keefe's shoulder was injured. This injury was not caused by any intentional conduct by Nelson against
2 Keefe.

3 9. The article's description of Nelson's interactions with teammate Drew Gordon
4 ("Gordon") is false. Nelson and Gordon never had a fight, not at a teammate's apartment or anywhere
5 else, nor do I recall Gordon receiving a black eye as a result of his interactions with Nelson.

6 I declare under penalty of perjury under the laws of the State of California that the foregoing is
7 true and correct. Executed on April 5, 2012 at 12pm.

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10 J'mison Morgan
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DECLARATION OF NORMAN POWELL

I, Norman Powell, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for U.C.L.A. I joined the U.C.L.A. basketball team in 2011.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 21, 2012 at Los Angeles, California.


Norman Powell

DECLARATION OF TRAVIS WEAR

I, Travis Wear, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for U.C.L.A. I transferred to U.C.L.A. in 2010, and have played basketball for U.C.L.A. since. Prior to playing for U.C.L.A., I attended and played basketball for the University of North Carolina for the 2009-2010 season.

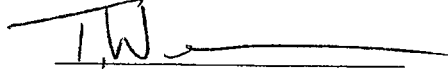
3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated ("SI") magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am unaware of any attempt by SI or Dohrmann to contact me regarding this article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I am aware of the parts of the article describing Nelson's behavior toward teammate Matt Carlino. This article's characterization of Nelson's behavior toward Carlino is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that Carlino "dreaded practice" because of Nelson. I personally understand and believe that Carlino transferred to B.Y.U. not because of Nelson's behavior but because Carlino believed he was not receiving sufficient playing time during games.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed on May 7, 2012 at Los Angeles, California.

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4 
Travis Wear

DECLARATION OF JOSH SMITH

I, Josh Smith, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for U.C.L.A. I matriculated to U.C.L.A. and joined the U.C.L.A. basketball team in 2010.

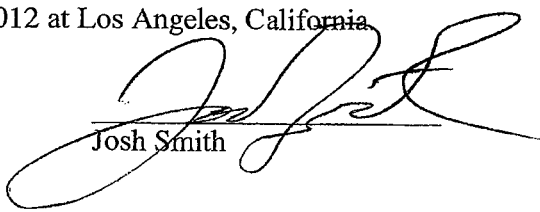
3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. To my knowledge, no one from Sports Illustrated attempted to contact me regarding this article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. According to the article, Coach Howland favored me over the other players, "allowing [me] to miss meetings and to arrive late or unprepared for workouts" and otherwise did not "hold[me] accountable." This is false. Coach Howland did not favor me this way over the other players, not by refusing to discipline me or by any other method.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 7, 2012 at Los Angeles, California


Josh Smith

DECLARATION OF ANTHONY STOVER

I, Anthony Stover, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student-athlete basketball player presently playing for U.C.L.A. I joined the U.C.L.A. basketball team in 2009.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

7. The article's description of Nelson's behavior toward teammate Tyler Trapani ("Trapani") is false. I attended the practice at which Trapani was injured. Nelson did not go "out of his way to step on Trapani's chest as he lay on the ground" during team practice.

8. The article's description of Nelson's behavior toward teammate James Keefe is false. I attended the practice at which James Keefe's shoulder was re-injured. This injury was not caused by any intentional conduct by Nelson against Keefe.

9. The article's description of Nelson's behavior toward teammate Alex Schrempf ("Schrempf") is false. I attended the practice during which Schrempf's hip was injured. Nelson did not intentionally attack Schrempf during practice by knocking him to the ground from behind, nor did Schrempf suffer a back injury as a result of his in-play interactions with Nelson.

10. The article's description of Nelson's behavior toward teammate Matt Carlino ("Carlino") is false. I never saw or heard Nelson "yell at Carlino to leave the locker room" or call him "concussion boy" after Carlino suffered a concussion during the preseason, nor do I believe that Carlino "dreaded practice" because of Nelson. My understanding is that Carlino transferred to B.Y.U. not because of Nelson's behavior but because Carlino wanted more playing time during games.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 8, 2012 at Los Angeles, California.

Anthony Stover

DECLARATION OF ALEX SCHREMPF

I, Alex Schremppf, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a student presently attending the University of Washington. Prior to transferring to the University of Washington in the latter half of 2011, I attended U.C.L.A. and played for its basketball team as a student-athlete. I joined the U.C.L.A. basketball team in 2009, but I only played for part of the 2010-2011 season.

3. I am aware of article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I spoke with Dohrmann regarding this article prior to it being published. During our telephonic conversation, Dohrmann told me that he had heard that Reeves Nelson ("Nelson") intentionally hurt me during practice as part of his "pattern" of abusive behavior toward teammates. I explained to Dohrmann that any such claims or stories were incorrect.

5. During our conversation, Dohrmann specifically told me that he had "heard" that Nelson intentionally injured me during practice by knocking me to the ground from behind. According to Dohrmann's "source," Nelson's conduct caused me to suffer a serious back injury. I explained to Dohrmann that this version of events was incorrect. While I was fouled by Nelson during a practice game, I explained to Dohrmann that I did not believe Nelson intentionally meant to injure me. I further explained to Dohrmann that I hurt my hip as a result of landing on my back during this practice game. I further explained to Dohrmann that I was then and remain close friends with Nelson.

6. During my time at U.C.L.A., I regularly attended practice and team games with Nelson. I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them for physical aggression during practice.

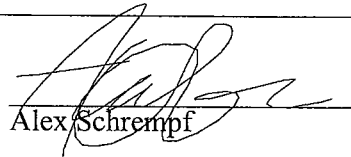
7. Dohrmann talked to me about an incident between Nelson and teammate Tyler Trapani

1 ("Trapani"). I attended the practice at which Trapani was injured. I told Dohrmann that I did not
2 observe Nelson "step on Trapani's chest as he lay on the ground" during team practice.

3 8. The article's description of Nelson's behavior toward teammate James Keefe is false. I
4 attended the practice at which James Keefe's shoulder was re-injured. I do not believe that his injury
5 was caused by any intentional conduct by Nelson against Keefe.

6 9. I never saw or heard Nelson call teammate Matt Carlino ("Carlino") "concussion boy."

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed on May 9th, 2012 at _____.

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11 Alex Schrempf
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DECLARATION OF TYLER TRAPANI

I, Tyler Trapani, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am a walk-on student-athlete presently attending U.C.L.A. I joined the U.C.L.A. basketball team in 2008 and have played for U.C.L.A. until 2012.

3. I am aware of the article entitled "Special Report: Not the U.C.L.A. Way" written by George Dohrmann ("Dohrmann") and featured in the March 5, 2012 issue of Sports Illustrated magazine (the "article").

4. I did not speak with or communicate with Dohrmann or anyone else at Sports Illustrated regarding this article, nor did I contribute any quotes referenced to former U.C.L.A. basketball players in his article. I am not aware of any attempts by Dohrmann or anyone else from Sports Illustrated to contact me regarding this article.

5. During my time at U.C.L.A., I regularly attended practice and team games with Reeves Nelson ("Nelson"). I never saw Nelson intentionally hurt or intentionally try to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson ever intentionally hurt or tried to hurt any member of the U.C.L.A. basketball team or staff, nor do I believe that Nelson "stalked" or "targeted" them during practice. I did not observe and do not believe that Coach Howland favored Nelson over the other players in any fashion, not with respect to discipline or anything else.

6. I never saw Nelson "lose it" during practice or otherwise "disrupt" practice, not because of foul calls or otherwise. I do not believe that Coach Howland gave Nelson "the benefit of the doubt on foul calls in practice so [Nelson] wouldn't lose it," nor did I see or hear Nelson yell at Coach Howland if a foul was called against him during practice.

7. I am aware that in the article written by Dohrmann, he refers to an incident during a team practice where I took a charge from Nelson. I did take a charge from Nelson during what we call a "3 on 2, 2 on 1" drill. Contrary to what was written in the Sports Illustrated article, Nelson did not go out of his way to step on me. Moreover, I do not believe he in any way tried to harm me during this or any drill.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed on May 7, 2012 at Los Angeles, California.

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5 Tyler Trapani
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EXHIBIT C

FINK



STEINBERG

ATTORNEYS AT LAW

11500 OLYMPIC BLVD, SUITE 316, LOS ANGELES, CA 90064
WWW.FINKSTEINBERG.COM

PHONE : (310) 268-0780 FAX: (310) 268-0790

LOS ANGELES - SAN FRANCISCO - MACAU

February 29, 2012

VIA U.S. MAIL AND FACSIMILE (212) 467-2417

John Huey, Editor in Chief
SPORTS ILLUSTRATED
135 West 50th Street
New York, N.Y. 10020-1393

Re: **Reeves Nelson - "Special Report: Not the UCLA Way"**

Dear Mr. Huey:

This firm serves as counsel to former U.C.L.A. basketball player Reeves Nelson ("Nelson"). This letter is regarding the false and defamatory article published this morning in Sports Illustrated's online edition and the soon-to-be-published March 5, 2012 print edition entitled "Special Report: Not the UCLA Way," authored by your senior writer George Dohrmann("Dohrmann").

In this lengthy article, Dohrmann repeatedly blames Nelson for single-handedly bringing down the U.C.L.A. Men's Basketball program by and through his purported bullying of his teammates and team staff. Among other things, Dohrmann accuses Nelson of physically attacking teammate Mike Moser with his forearm and shoulder during practice, of repeatedly attacking teammate Drew Gordon at another teammate's apartment and giving him a black eye, of intentionally pulling down and re-injuring teammate James Keefe's post-surgery arm during practice, of intentionally "hack[ing]... from behind" teammate Alex Schrempf to the ground during practice so hard that Schrempf was sidelined for months with a back injury, of intentionally injuring Brendan Lane's ribs with an elbow throw at practice, and of going "out of his way to step on" teammate Tyler Trapani's chest "as he lay on the ground" during practice. Dohrmann recounts an alleged incident when Nelson "got his revenge" on teammate Tyler Honeycutt for an assumed slight by urinating on Honeycutt's clothes and bed and then flipping Honeycutt's bed over. Dohrmann claims that Nelson "often reacted to hard fouls or calls against him in practice by committing violent acts against teammates," that he "stalk[ed] his targets," and that he often "r[an] across the court away from a play to hit someone." To make his point about Nelson crystal clear, he characterizes Nelson as being "the ringleader... with this crazy side.... a classic bully [who] target[ed] teammates who weren't as athletically gifted as he [sic] and [who] torment[ed] the support staff." He even includes a photograph of Nelson at the top of the article with a caption reading "Reeves Nelson (right) bullied and sometimes injured his teammates before coach Ben Howland dismissed him from the team in November."

Every single one of Dohrmann's accusations and claims about Nelson set forth above is categorically false. What sources, if any, fed him this vicious and defamatory nonsense? Dohrmann fails to identify any of these sources in his article, although he claims to have spoken to "more than a dozen players and staff members from the past four Bruins teams." If Dohrmann bothered to speak with any of Nelson's claimed "victims" (as he repeatedly refers to them in this screed), he would learn that none of these events ever happened. He would learn that Nelson is not and never has been an out-of-control psychotic bully repeatedly going "out of his way" to commit criminal acts of violence against his own teammates. He would learn that all of Nelson's purported "victims" and "targets" then were and still remain Nelson's good friends. This is particularly true with respect to "victim" Drew Gordon, a close friend of Nelson's since their freshman year in high school.

Even more egregious than the falsehoods set forth above, Dohrmann falsely claims in this article that "Nelson confirmed all these incidents to SI." Dohrmann recites quotes from Nelson purportedly confirming the same. Nelson did *not* confirm any of these alleged incidents to Dohrmann nor to anyone else at Sports Illustrated. He did not confirm any of these alleged incidents to Dohrmann because Dohrmann never asked Nelson about them during their one extremely brief telephone call. Dohrmann never asked him about his alleged bullying, or the urinating story, or the purported fight between Nelson and Gordon which left Gordon with a black eye. Nelson's statements quoted by Dohrmann in the article were made in reference to the reasons behind his dismissal from the team. Notwithstanding Dohrmann's implications to the contrary, Nelson was dismissed for a number of reasons and not for any "acts of violence" or bullying on his part.

Dohrmann's story is all the more nonsensical when compared to Nelson's record as a NCAA player. If Nelson was an out-of-control bully with a "crazy side," why did he never attack any player on the opposing team? Why would his teammates, themselves no slouches in physical size and strength, permit him to repeatedly commit "violent acts" against them? Why are they still his friends?

By publishing this false and defamatory attack on Nelson, Sports Illustrated has done irreparable damage to this young man's personal, professional, and public reputation, his good name, and his budding professional basketball career. On his behalf, I demand that you publish a retraction of this article immediately, particularly as to every reprehensible claim made about Nelson therein, and that you identify Dohrmann's sources, if any, who fed him these falsehoods.

Please feel free to call or contact me at (310) 268-0782.

John Huey
February 29, 2012
Page 3 of 3

Very truly yours,

A handwritten signature in black ink, appearing to read 'K A Fink', with a long horizontal line extending to the right.

Keith A. Fink
For FINK & STEINBERG

FINK



11500 OLYMPIC BLVD, SUITE 316, LOS ANGELES, CA 90064
WWW.FINKSTEINBERG.COM

PHONE : (310) 268-0780 FAX: (310) 268-0790

LOS ANGELES - SAN FRANCISCO - MACAU

March 2, 2012

VIA U.S. MAIL AND FACSIMILE (212) 522-3890

Judith R. Margolin, Deputy General Counsel

TIME, INC.

TIME & LIFE BUILDING

1271 Avenue of the Americas

New York, NY 10020

Re: **Reeves Nelson - "Special Report: Not the UCLA Way"**

Dear Ms. Margolin:

This letter is in response to your letter of March 1, 2012, regarding the above-entitled article about U.C.L.A. and Reeves Nelson. In your letter, you write that you, publisher Time, Inc., and magazine Sports Illustrated "cannot countenance [Nelson's] attack on Mr. Dohrmann after the fact, denying the substance of their conversation." You write that Dohrmann has notes from his ten minutes plus telephone conversation with Nelson that reflect Nelson's confirmation of the alleged bullying incidents (which notes you fail to quote or attach to your letter). You refuse to identify any of Dohrmann's sources but "note that they are plentiful and credible" and state that "many people from Mr. Nelson's life, past and present... have observed his behavior, including the specific incidents described in our article." You refuse to issue a retraction and conclude by refusing to "address all of the points raised in [my] letter because doing so "would not be appropriate..."

This final quote sums up the substance of your entire letter, which responds to nothing in mine. Despite "not[ing] that [Dohrmann's article sources] are plentiful and credible," you fail to note that Dohrmann largely failed to speak with or contact any of Nelson's alleged "victims." Who are Dohrmann's "plentiful and credible" sources that you reference in your letter? The players Dohrmann did talk to, i.e. James Keefe, told Dohrmann that Nelson did *not* bully or assault them in any fashion. Again, if Dohrmann bothered to speak with Alex Schrempf, whose back Nelson allegedly injured, Tyler Honeycutt, on whose bed and clothes Nelson allegedly urinated, or Drew Gordon, whom Nelson allegedly gave a black eye during a fight, they would confirm that none of these alleged incidents ever happened. All of these players have since confirmed in writing that these portions of Dohrmann's article about Nelson are false. I again challenge you to identify Dohrmann's sources who state otherwise.

Dohrmann's story itself is chock-full of easily refutable "facts." As an obvious example, Schrempf did not injure his back during practice that sidelined him for months - he injured his hip. Again, if Dohrmann had actually contacted Schrempf, he would not include this glaring

Judith R. Margolin
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error in his article.

Dohrmann's article was written with malice, as part of his apparent years-long pattern and practice of attacking major universities' various athletic programs. Years back, Dohrmann publicly attacked U.C.L.A.'s Baron Davis and then-coach Jim Harrick for Davis's driving a black 1991 Chevy Blazer. Dohrmann claimed that the car was purchased in violation of NCAA rules, notwithstanding the NCAA's and Pac-10 Conference's decisions to the contrary. Relying on a less than reputable source (a coach who sexually assaulted brain-injured hospital patients), Dohrmann publicly attacked Coach Howland and the school in his 2010 book "Play Their Hearts Out: A Coach, His Star Recruit, and the Youth Basketball Machine." In the months since, we are informed and believe that Dohrmann has repeatedly disparaged U.C.L.A.'s various athletic programs on his public twitter account. In a 2011 article in the Columbia Journalism Review, Dohrmann personally described his mindset when researching and writing such stories as "[y]ou walk in and you assume that the school is cheating." Dohrmann's recent article and his personal attacks on Nelson and Howland are part of his transparent attempt to tarnish the reputation of one of the most storied and preeminent academic and athletic institutions in the country.

We understand that this article has brought your magazine and its author a great deal of publicity and press. We further understand that it is difficult for Dohrmann to own up to these article errors in the court of public opinion. Please do the right thing and issue a public retraction of Dohrmann's malicious and unnecessary personal attacks on Reeves Nelson.

Very truly yours,

A handwritten signature in black ink, appearing to read "K.A. Fink", with a long, sweeping horizontal line extending to the right.

Keith A. Fink
For FINK & STEINBERG